



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SPN:KTF

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 19, 2021

By Electronic Mail and ECF

The Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Full Play Group, SA, et al.
Criminal Docket No. 15-252 (S-3) (PKC)

Dear Judge Chen:

The government respectfully submits this letter and accompanying document pursuant to Your Honor's order of March 3, 2021 requiring the government to produce for in camera review all PowerPoint decks in its possession from Traffic, Datasa, T&T Sports Marketing Ltd., Fox Pan American Sports, CONCACAF, CONMEBOL and FIFA. See ECF Dkt. Entry dated Mar. 3, 2020 (Order). The enclosed PowerPoint deck, provided to the government by CONCACAF, is denoted by Bates numbers EDNY-Court_0000291 through EDNY-Court_0000300.

As set forth in the government's previous submissions to the Court in response to the defendants' motion to compel (see ECF Dkt. Nos. 1444 and 1476), the government submits that the PowerPoint decks provided during the course of presentations by the above-listed entities are not discoverable because those decks either reference underlying materials already produced to the defendants or otherwise fall outside the scope of Rule 16, Brady, and related authorities. To the extent such presentations include substantive, material, non-public information not otherwise available in the underlying documents produced by the government, the government has disclosed and will disclose, as appropriate, such information in letter form. The government respectfully requests that the Court deny the defendants' motion to the extent it

urges compelled production of documents the government intends to withhold as not within the scope of its disclosure obligations under Rule 16, Brady, Giglio, or the Jencks Act.

Respectfully submitted,

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cc: Counsel of record (by ECF) (without enclosures)
Clerk of Court (PKC) (by ECF) (without enclosures)

Enclosure